

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

COBBLESTONE WIRELESS, LLC

Plaintiff,

v.

CISCO SYSTEMS, INC.

Defendant.

Case No. 2:23-cv-00454-JRG-RSP
(Lead Case)

COBBLESTONE WIRELESS, LLC

Plaintiff,

v.

HEWLETT PACKARD ENTERPRISE
COMPANY, ARUBA NETWORKS, LLC

Defendants.

Case No. 2:23-cv-00457-JRG-RSP
(Member Case)

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR HEARING ON DEFENDANTS’ MOTION TO STAY
PROCEEDINGS PENDING *INTER PARTES* REVIEW
AND *EX PARTE* REEXAMINATION**

Defendants Cisco Systems, Inc., Hewlett Packard Enterprise Company, and Aruba Networks, LLC (collectively, “Defendants”) respectfully request a hearing on their Motion to Stay Proceedings Pending *Inter Partes* Review and *Ex Parte* Reexamination (“Motion to Stay”). Dkt. No. 52. Counsel for Defendants conferred with Counsel for Plaintiff. Plaintiff does not believe a hearing on Defendants’ Motion to Stay is necessary, but defers to the Court.

Defendants’ Motion to Stay is fully briefed and ripe for hearing. Dkt. Nos. 52 and 56-58. Further, on September 24, 2024, the United States Patent and Trademark Office (“USPTO”) granted *inter partes* review of U.S. Patent No. 7,924,802 (the “’802 Patent”) – the only patent-in-

suit in this case – on all grounds requested by Defendants. Dkt. No. 63. Also, on September 10, 2024, Samsung Electronics America, Inc.’s (“Samsung”) petition requesting *inter partes* review of claims 1-10, 13-14, 17, 21-25 of the ’802 Patent was granted by the USPTO and all grounds were instituted. *Id.* Lastly, the USPTO also granted an *ex parte* reexamination filed by Unified Patents LLC, challenging claims 1-15 and 17-23 of the ’802 Patent on June 13, 2024. *Id.*

A hearing will allow the parties to address by oral argument any issue necessary for the Court to determine whether this matter should be stayed awaiting the results of *inter partes* review and *ex parte* reexamination involving the only patent-in-suit in this case and prevent the parties from potentially incurring significant litigation costs on issues that may be resolved following such reviews and examination.

For all these reasons, Defendants respectfully request a hearing on their Motion to Stay.

Respectfully submitted,

/s/ Jennifer H. Doan

Jennifer H. Doan

Texas Bar No. 08809050

jdoan@haltomdoan.com

Joshua R. Thane

Texas Bar No. 24060713

jthane@haltomdoan.com

HALTOM & DOAN

6500 Summerhill Rd., Suite 100

Texarkana, TX 75503

Telephone: 903.255.1000

Facsimile: 903.934.9257

Matthew S. Yungwirth

GA State Bar No. 783597

msyungwirth@duanemorris.com

DUANE MORRIS LLP

1075 Peachtree Street NE

Suite 1700

Atlanta, Georgia 30309-3929

Telephone: (404)-253-6910

Tyler Marandola

PA State Bar No. 313585

tmarandola@duanemorris.com

DUANE MORRIS LLP

30 S. 17th Street

Philadelphia, PA 19103

Telephone: (215) 979-1000

*Counsel for Defendants Hewlett Packard
Enterprise Company and Aruba Networks, LLC*

/s/ Kyrie K. Cameron

Kyrie K. Cameron (TBN 24079450)
kcameron@pattersonsheridan.com
Randol Wayne Read (TBN 00798457)
rread@pattersonsheridan.com
Archibald Deleon Cruz (TBN 24137564)
acruz@pattersonsheridan.com
PATTERSON + SHERIDAN LLP
24 Greenway Plaza, Suite 1600
Houston, Texas 77046
Telephone: (713) 623-4844
Facsimile: (713) 623-4846

Eric H. Findlay (TBN 00789886)
efindlay@findlaycraft.com
FINDLAY CRAFT, P.C.
7270 Crosswater Avenue, Suite B
Tyler, Texas 75703
Telephone: (903) 534-1100
Facsimile: (903) 534-1137

Holly Engelmann (TBN 24040865)
HEngelmann@duanemorris.com
DUANE MORRIS LLP
Terrace 7
2801 Via Fortuna, Suite 200
Austin, Texas 78746-7567
Telephone: (512) 277-2246
Facsimile: (512) 597-2301

Louis N. Jameson
WJameson@duanemorris.com
Matthew S. Yungwirth
msyungwirth@duanemorris.com
Jayla C. Grant
jcgrant@duanemorris.com
DUANE MORRIS LLP
1075 Peachtree Street NE, Suite 1700
Atlanta, GA 30309
Telephone: (404) 253-6915
Facsimile: (404) 253-6901
msyungwirth@duanemorris.com
JCGrant@duanemorris.com

Counsel for Defendant Cisco Systems, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the above and foregoing document has been served via the Court's ECF system on October 16, 2024.

/s/ Kyrie K. Cameron
Kyrie K. Cameron

CERTIFICATE OF CONFERENCE

The undersigned certifies that pursuant to Local Rule CV-7(h), counsel for Defendants met with counsel for Plaintiff on October 15, 2024.

/s/ Kyrie K. Cameron
Kyrie K. Cameron